U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION III
CLEAN WATER ACT
COMPLIANCE INSPECTION REPORT

for

Name of Facility: Super Salvage, Inc.
Facility Address: 1711 1st St SW Washington, DC 20024
Mailing Address: 1711 1st St SW Washington, DC 20024

Report Prepared on: May 17, 2013 (*Date*) By: _____ (*Signature*), ERG

Report Final as of: _____ (*Date*) By: _____ (*Signature*), EPA

General Information

Type of Facility:	Industrial	**SIC Code:** 5093
Activity/Product:	Scrap Recycling Facility	
Owner:	Super Salvage, Inc.	
Operator:	Super Salvage, Inc.	
Permittee:	Unpermitted	
NOI Submittal Date:	No NOI submitted	
NOI Tracking Number:	No NOI submitted	
Effective Date of Coverage:	Unpermitted	
SWPPP Development Date:	No SWPPP developed	
SWPPP Developed By:	No SWPPP developed	
Site Area:	Approximately 1.3 acres	
Receiving Water and/or MS4:	Anacostia River via MS4	

How do we know its MS4? Confirmed?

A site map and vicinity map for the Super Salvage, Inc. are provided in Appe

On-Site Inspection Overview

Inspection Date: February 20, 2013
Entry Time: 1:40 pm EST
Exit Time: 3:30 pm EST

Photographs 6 and 11 in Appendix B) and so has not been pumped out or cleaned in the 15 years he has worked there.

According to Mr. Bullock, there are no stormwater outfalls at the Facility and the site is designed so that stormwater does not leave the site. The perimeter of the site has a concrete curb, Entrance 1 has a berm, and Entrance 2 slopes into the Facility (see Photographs 2, 50, and 53 in Appendix B). However, in many cases, the EPA inspection team observed materials stored outside the perimeter of the Facility (see Photographs 58, 63, and 75 through 78 in Appendix B), sediment/material/liquid residue in and around the entrance and outside of the site (see Photographs 1,3, 47, 50, 56, 61, 73, 75, 80, 83 and 84 in Appendix B), and there was evidence of what appeared to be oil staining and fluid losses beyond the curbing and berm and sediment into the storm drain near the corner of First Street SW and S Street SW (see Photographs 75, 79, 80, 81, 83, and 84 in Appendix B).

NOI/Permit Requirements and Observations

The following observations were made relative to the requirements of the NOI for Storm Water Discharges Associated with Industrial Activity under the NPDES Multi-Sector General Permit and the 2008 USEPA Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP). During the inspection, the EPA inspection team walked the entrance, exit, the scrap metal piles, two ponds, a hydraulics machinery building, and an adjacent materials storage area used by Super Salvage but, according to Mr. Bullock, is owned by the District of Columbia.

MSGP Section 1.3.1 (Deadlines for Submitting Your NOI and Your Official Date of Permit Coverage) – The MSGP, which became effective on September 29, 2008, and regulates stormwater discharges from industrial facilities in 29 different industrial sectors, requires industrial facilities to implement and maintain site-specific stormwater control measures and to develop SWPPPs. New industrial facilities which began operating after January 5, 2009, must submit an NOI a minimum of 60 days prior to commencing discharge, or a minimum of 30 days if the SWPPP is posted on the Internet during this period and the Internet address (i.e., URL) to the SWPPP is provided on the NOI form.

Observation 1: Based on the industrial activities at the site, Super Salvage is an industrial scrap recycling facility categorized under Subsector N1 (Scrap Recycling and Waste Recycling Facilities except Source-Separated Recycling) according to Appendix D of the MSGP. At the time of the inspection, Super Salvage had not submitted an NOI for coverage under the MSGP. According to Mr. Bullock the Facility began operations in the 1990s under new ownership. Mr. Bullock stated that the grading of the Facility and perimeter berm were designed to contain all fluids, including stormwater, inside the Facility. In addition, Mr. Bullock stated that the Facility captures all stormwater and is held in the large runoff collection pond until it evaporates. Mr. Bullock stated that because the Facility does not discharge stormwater, he believes they do not need a permit.

When asked if self-inspections or other inspections had been conducted at the Facility, Mr. Bullock indicated that no inspections have been conducted during his time of employment that he recalls. After the inspection, the DDOE provided

EPA with an Illicit Discharge Investigation Report for Super Salvage dated March 30, 2010 (see Appendix D).

MSGP Section 2.1.2.1 (Minimize Exposure) – Section 2.1.2.1 of the MSGP requires the facility to minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff by either locating these industrial materials and activities inside or protecting them with storm resistant coverings (although significant enlargement of impervious surface area is not recommended). In minimizing exposure, the facility should pay particular attention to the following:

- Use grading, berming, or curbing to prevent runoff of contaminated flows and divert run-on away from these areas;
- Locate materials, equipment, and activities so that leaks are contained in existing containment and diversion systems (confine the storage of leaky or leak-prone vehicles and equipment awaiting maintenance to protected areas);
- Clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants;
- Use drip pans and absorbents under or around leaky vehicles and equipment or store indoors where feasible;
- Use spill/overflow protection equipment;
- Drain fluids from equipment and vehicles prior to on-site storage or disposal;
- Perform all cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray; and
- Ensure that all washwater drains to a proper collection system (i.e., not the stormwater drainage system).

Observation 2: The EPA inspection team observed a number of spills and no active cleanup of those spills. The EPA inspection team observed what appeared to be oil and/or chemical layer floating on the surface of the large runoff collection pond. A saturated absorbent sock was observed adjacent to the pond (see Photographs 38-40 in Appendix B); however, the facility did not have active mitigation measures in place to remove the layer floating on top of the large collection pond. The EPA inspection team also observed vehicle air conditioning units placed on the ground and leaking fluids; however, no absorbent materials were placed on the leaking fluids (see Photographs 48-50 in Appendix B). The EPA inspection team observed what appeared to be oil staining outside of the perimeter berm (see Photographs 75 and 78 in Appendix B), sediment residue and liquids on District of Columbia (DC) streets outside/near entrance 2 (see Photographs 61 and 62 in Appendix B) and drainage from Super Salvage's open-top dumpsters located on, according to Mr. Bullock, DC property adjacent to the facility fence line (see Photographs 63 and 64 in Appendix B).

MSGP Section 2.1.2.3 (Maintenance) – Section 2.1.2.3 requires a facility regularly inspect, test, maintain, and repair all industrial equipment and systems to avoid situations that may result in leaks, spills, and other releases of pollutants in stormwater discharged to receiving waters. The permittee must maintain all control measures that are used to achieve the effluent limits required by the permit in

effective operating condition. Nonstructural control measures must also be diligently maintained (e.g., spill response supplies available, personnel appropriately trained). If the permittee finds that its control measures need to be replaced or repaired, the permittee must make the necessary repairs or modifications as expeditiously as practicable.

Observation 3: The EPA inspection team observed large amounts of staining and pooled fluids on the floor of the building from hydraulic equipment and 55-gallon drums (see Photographs 20 through 23 in Appendix B). The EPA inspection team observed saturated absorbent material that had been placed on some of the fluids. In addition, the door to the building led to small earthen trenches that conveyed liquids into the small runoff collection pond near the center of the facility (see Photograph 19 in Appendix B). According to Mr. Bullock, the small runoff collection pond is then pumped to the larger runoff collection pond.

MSGP Section 2.1.2.4 (Spill Prevention and Response Procedures) – Section 2.1.2.4 of the MSGP requires a facility to minimize the potential for leaks, spills, and other releases that may be exposed to stormwater and develop plans for effective response to such spills if or when they occur. At a minimum, the facility must implement:

- Procedures for plainly labeling containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides," etc.) that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur;
- Preventative measures such as barriers between material storage and traffic areas, secondary containment provisions, and procedures for material storage and handling; and
- Procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases.

Observation 4: Super Salvage stored what appeared to be its used waste oil in an unlabeled plastic bin near Entrance 1 (see Photographs 71 and 72 in Appendix B). Several unlabeled open buckets and drums that were labeled as lubricants were also stored by the entrance on wooden pallets. It was unclear to the EPA inspection team whether the contents inside of these drums were lubricants (see Photographs 3, 4, and 70).

Observation 5: The EPA inspection team observed storage of what appeared to be lubricants and used oil filters in metal drums in various locations on site (See Photographs 3, 4, 15, 17, and 70 in Appendix B). Scrap engine parts were stored in cardboard boxes (see Photographs 65 and 66 in Appendix B). A 500-gallon diesel fuel tank was stored near Entrance 2. The diesel fuel tank was located in a high-traffic area with no barricades and was immediately adjacent to several oxygen tanks and propane tanks (see Photograph 53, 54, and 57 in Appendix B). When asked, Mr. Bullock was unsure if the oxygen and propane tanks were full or empty. The EPA inspection team did not observe secondary containment measures in place around the diesel fuel tank and small propane tanks. The EPA inspection team also observed additional fuel storage tanks including a 500-gallon diesel storage

tank and numerous 55-gallon drums, without secondary containment, of what appeared to contain oils (see Photographs 34 and 44).

The EPA inspection team observed storage of sorted metal, engine parts, car batteries, leaking air conditioning units, and hydraulic equipment in various uncovered areas throughout the facility as well as on the property, that according to Mr. Bullock, is owned by DC (see Photographs 16, 24-28, 32-38, 41-45, 48-50, 63, and 64 in Appendix B).

Observation 6: The EPA inspection team observed what appeared to be oil staining and pools of oil present throughout the facility (see Photographs 67 and 68 in Appendix B). In some cases saturated absorbent material was present on top of the fluid (see Photograph 70 in Appendix B). The EPA inspection team observed leaking air conditioning equipment adjacent to the property fence line (see Photographs 48, 49, and 50 in Appendix B). As stated in observation 3, the EPA inspection team observed the inside of a small building containing hydraulic equipment. The floors had saturated absorbent material located near the drums and hydraulic equipment, in addition to pooled fluids underneath the hydraulic machinery (see Photographs 20-23 in Appendix B).

Based on a visual inventory of the large petroleum storage tanks and the 55-gallon drums, the EPA inspection team estimates the facility has in excess of 1,320 gallons of above-ground oil storage capacity. When asked about a Spill Prevention, Control, and Countermeasure (SPCC) plan for the facility, Mr. Bullock stated the facility has neither developed nor implemented an SPCC plan.

MSGP Section 2.1.2.9 (Employee Training) – Section 2.1.2.9 of the MSGP states the permittee must train all employees who work in areas where industrial materials or activities are exposed to stormwater, or who are responsible for implementing activities necessary to meet the conditions of this permit (e.g., inspectors, maintenance personnel), including all members of the Pollution Prevention Team. Training must cover both the specific control measures used to achieve the effluent limits, and monitoring, inspection, planning, reporting, and documentation requirements in other parts of this permit. EPA recommends training be conducted at least annually (or more often if employee turnover is high).

Observation 7: Mr. Bullock did not provide any evidence that stormwater-related training had been provided to employees that work in areas where industrial materials are exposed to stormwater.

MSGP Section 2.1.2.12 (Dust Generation and Vehicle Tracking of Industrial Materials) – Section 2.1.2.12 of the MSGP requires a permittee to minimize the generation of dust and off-site tracking of raw, final, or waste materials.

Observation 8: A Google Earth® map dated October 2012 shows sediment residue at both Entrance 1 and Entrance 2 of the site (see Site Map in Appendix A). During EPA's inspection of Super Salvage and the surrounding roadways, the EPA inspection team observed sediment residue on DC streets near both entrances and

sediment entering a storm drain from the street (see Photograph 1, 53, 56, 58-64, and 79-81 in Appendix B).

MSGP Section 4.1 (Routine Facility Inspections) – The industrial facility seeking coverage under the MSGP must conduct routine facility inspections of all areas of the facility where industrial materials or activities are exposed to stormwater, and of all stormwater control measures used to comply with the effluent limits contained in the permit. Routine facility inspections must be conducted at least quarterly (i.e., once each calendar quarter), although in many instances, more frequent inspections (e.g., monthly) may be appropriate for some types of equipment, processes, and control measures or areas of the facility with significant activities and materials exposed to stormwater. The inspections must be performed during periods when the facility is in operation. The inspection schedules must be included in the SWPPP. These routine inspections must be performed by qualified personnel with at least one member of the facility's stormwater pollution prevention team participating. At least once each calendar year, the routine facility inspection must be conducted during a period when a stormwater discharge is occurring. Section 4.1.2 of the MSGP states the permittee must document the findings of each routine facility inspection performed and maintain this documentation on site with the SWPPP. At a minimum, the documentation of each routine facility inspection must include:

- The inspection date and time;
- The name(s) and signature(s) of the inspector(s);
- Weather information and a description of any discharges occurring at the time of the inspection;
- Any previously unidentified discharges of pollutants from the site;
- Any control measures needing maintenance or repairs;
- Any failed control measures that need replacement;
- Any incidents of noncompliance observed; and
- Any additional control measures needed to comply with the permit requirements.

Observation 9: Mr. Bullock indicated that no stormwater inspections were formally conducted at the site since his employment; therefore, inspection paperwork was not available at the time of the inspection. He stated that after storm events employees visually check the small collection pond in the morning and run the manual pump to the large pond as needed.

MSGP Section 4.2.1 (Quarterly Visual Assessment) – Once each quarter for the entire permit term, the facility must collect a stormwater sample from each outfall (except as noted in Part 4.2.3) and conduct a visual assessment of each of these samples. These samples are not required to be collected consistent with 40 CFR Part 136 procedures but should be collected in such a manner that the samples are representative of the stormwater discharge. The visual assessment must be made on a sample in a clean, clear glass, or plastic container and examined in a well-lit area and the sample must be collected within the first 30 minutes of an actual discharge from a storm event. If it is not possible to collect the sample within the first 30 minutes of discharge, the sample must be collected as soon as practicable after the first 30 minutes. The samples must be visually inspected for the following water quality characteristics: color; odor; clarity; floating solids; settled solids; suspended solids; foam; oil sheen; and other obvious indicators of stormwater pollution. Section 4.2.2 of the MSGP states the results of the quarterly visual assessment must be documented and the results of the visual assessment documentation muse remain on site with the SWPPP.

Observation 10: According to Mr. Bullock quarterly visual assessments of stormwater pollution have not been conducted or documented. Mr. Bullock stated the Facility did not have a stormwater outfall due to the berms that had been placed around the perimeter to contain runoff. However, Mr. Bullock was unsure where the overflow (riser structure) to the large runoff collection pond discharged if levels reached the overflow (see Photographs 6 and 11).

MSGP Section 5.1 (Stormwater Pollution Prevention Plan) – The permittee must prepare a SWPPP for the industrial facility before submitting its Notice of Intent (NOI) for permit coverage. If a SWPPP was prepared for coverage under a previous NPDES permit, the permittee must review and update the SWPPP to implement all provisions of this permit prior to submitting its NOI. Section 5.1 of the MSGP requires the SWPPP to contain the following elements:

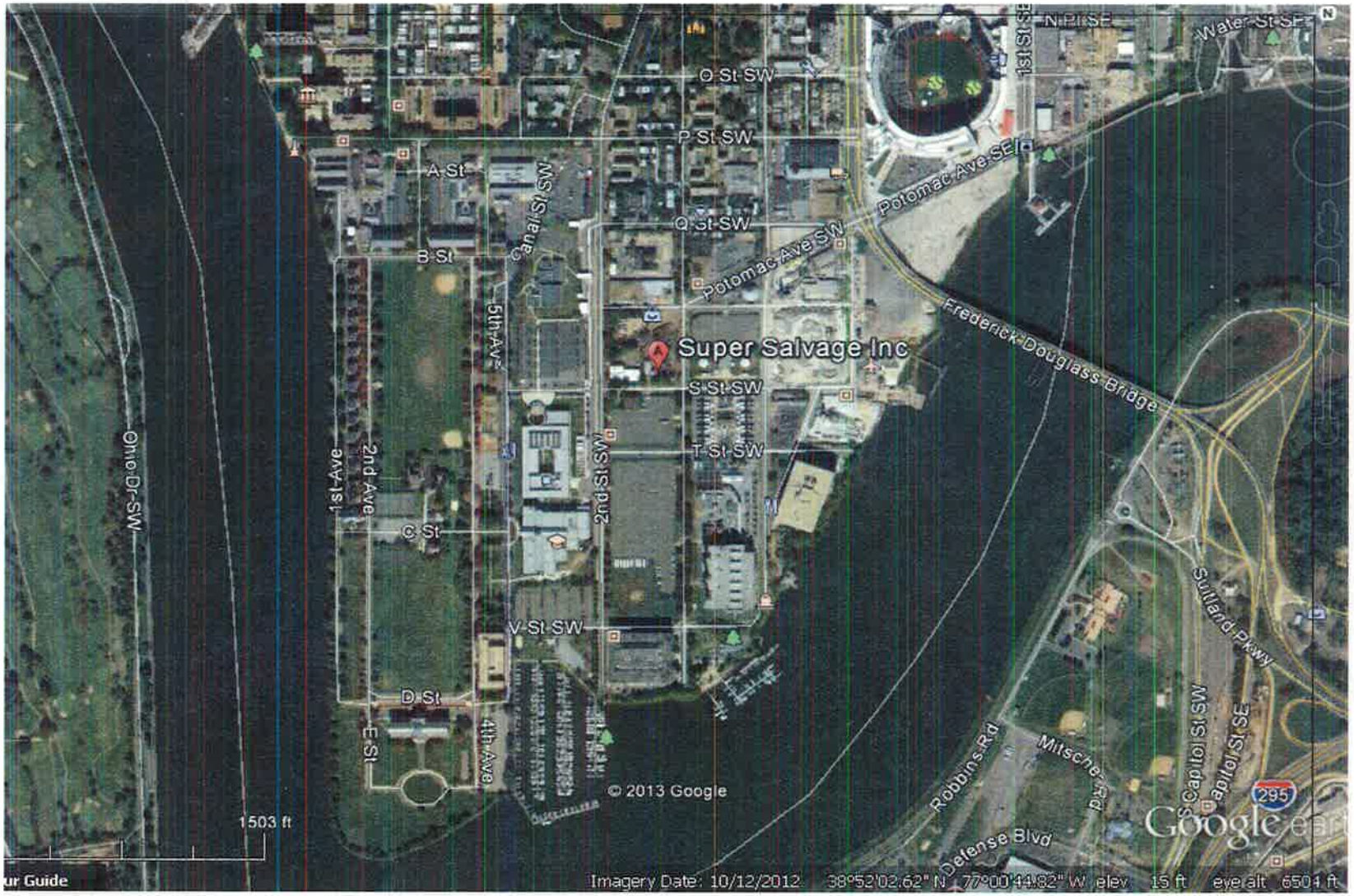
- Stormwater pollution prevention team;
- Site description;
- Summary of potential pollutant sources;
- Description of control measures;
- Schedules and procedures;
- Documentation to support eligibility considerations under other federal laws; and
- Signature requirements.

Section 5.2 of the MSGP requires the permittee to modify the SWPPP whenever necessary to address any of the triggering conditions for corrective action in Part 3.1. Section 3.1 includes requirements for the selection, design, installation, and implementation of control measures if construction or a change in design, operation, or maintenance at the facility significantly changes the nature of pollutants discharged in stormwater from the facility, or significantly increases the quantity of pollutants discharged.

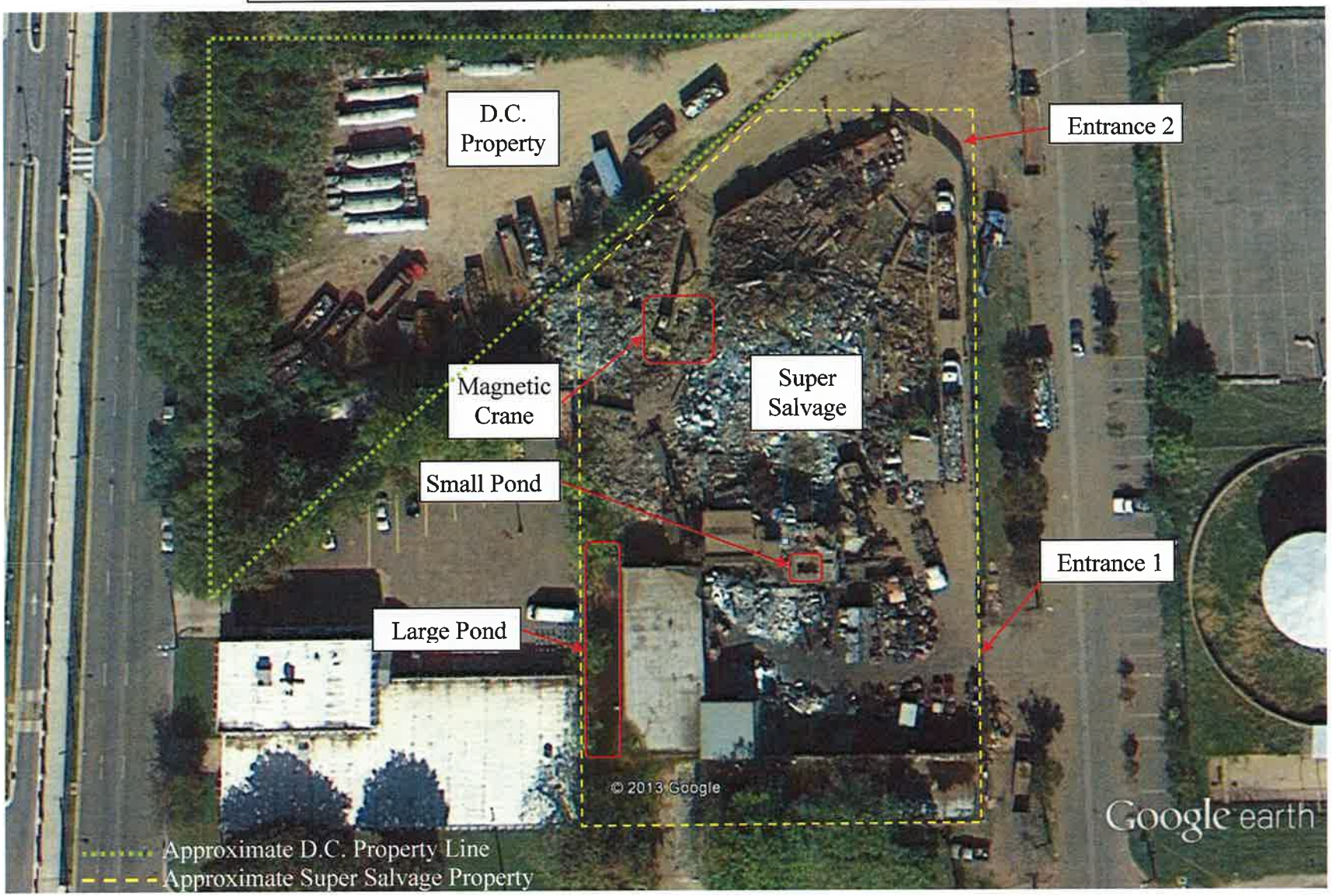
Observation 11: According to Mr. Bullock, the Facility has not developed a Storm Water Pollution Prevention Plan (SWPPP) or an SPCC plan.

Appendix A
Site Maps

Super Salvage, Inc.: Site Location Map



Super Salvage, Inc.: Infrastructure Locations and Site Outline Map



Super Salvage, Inc.: Reconnaissance Photograph Map

Appendix B
Photograph Log and Photographs

Photograph Log

The photographs were taken during the inspection by Allison Graham using a PENTAX Optio W80 digital camera. Original copies of the photos are on a CD in the file. The Photo Filename is the date and time stamp as recorded by the camera; format is YYYY-MM-DD--HH.MM.SS.JPG.

Photograph Reference #	Photograph File Name
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2	2013-02-20--13.49.04.JPG
3	2013-02-20--13.49.17.JPG
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7	2013-02-20--13.53.14.JPG
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9	2013-02-20--13.54.44.JPG
10	2013-02-20--13.55.24.JPG
11	2013-02-20--13.57.32.JPG
12	2013-02-20--14.02.21.JPG
13	2013-02-20--14.12.51.JPG
14	2013-02-20--14.13.43.JPG
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33	2013-02-20--14.22.13.JPG
34	2013-02-20--14.23.07.JPG
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82	2013-02-20--15.21.27.JPG
83	2013-02-20--15.23.29.JPG
84	2013-02-20--15.24.00.JPG

Photograph 1. **Facility sign and vehicle track out at Entrance 1.**

Photograph 2. **Berm at Entrance 1 of the site.**

Photograph 3. **Barrel on wooden pallets at Entrance 1 of the site.**

Photograph 4. **Close up view of the lubricant label on the barrel in Photograph 3.**

Photograph 5. **Overall view of the large runoff collection pond.**

Photograph 6. **The riser in the large runoff collection pond.**

Photograph 7. **Close up view of the sheen on the large runoff collection pond.**

Photograph 8. **Alternate view of the sheen on the large runoff collection pond.**

Photograph 9. **View of the sheen on the large runoff collection pond.**

Photograph 10. **View of the sheen on the large runoff collection pond.**

Photograph 11. **View of the sheen on the large runoff collection pond with the riser.**

Photograph 12. **The water elevation line height as indicated on side of the building.**

Photograph 13. **Small runoff collection pond with a manual pump near the center of the scrap yard.**

Photograph 14. **Alternate view of the small runoff collection pond with the manual pump.**

Photograph 15. **Storage of drums adjacent to small runoff collection pond.**

Photograph 16. **Pallets of used car batteries adjacent to small runoff collection pond.**

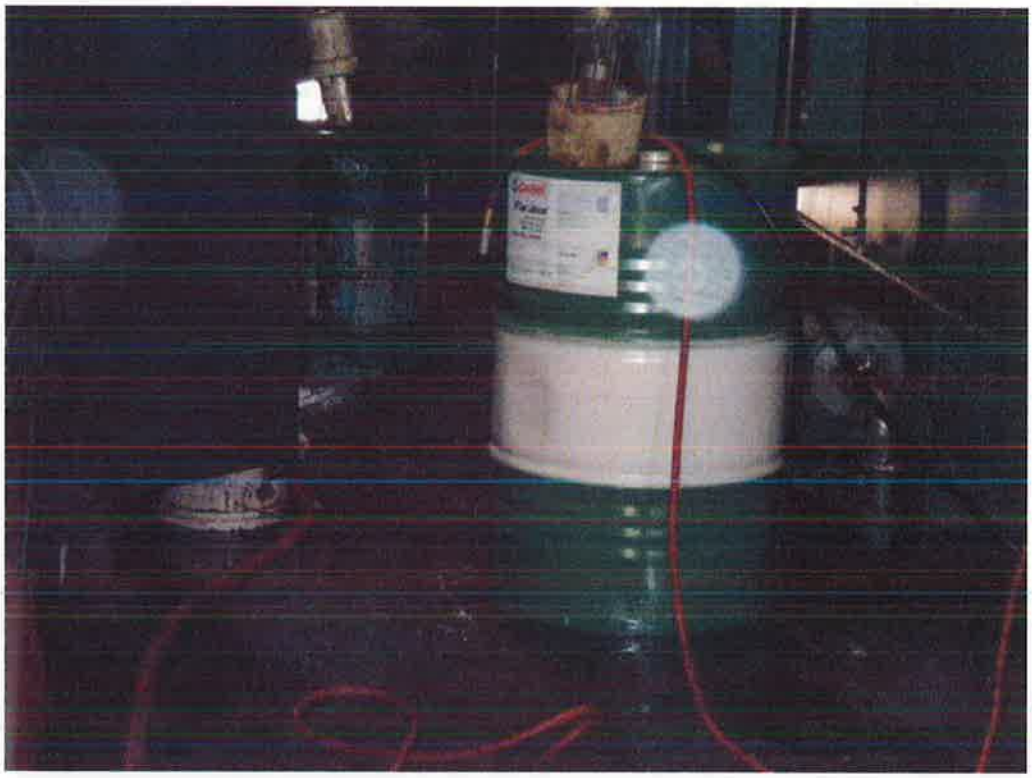
Photograph 17. **Alternate view of drums with what appeared to be oil staining.**

Photograph 18. **Close-up view of an open bucket also visible in Photograph 16.**

Photograph 19. **Trench leading to the small runoff collection pond.**

Photograph 20. **Pooled fluids and saturated absorbent materials.**

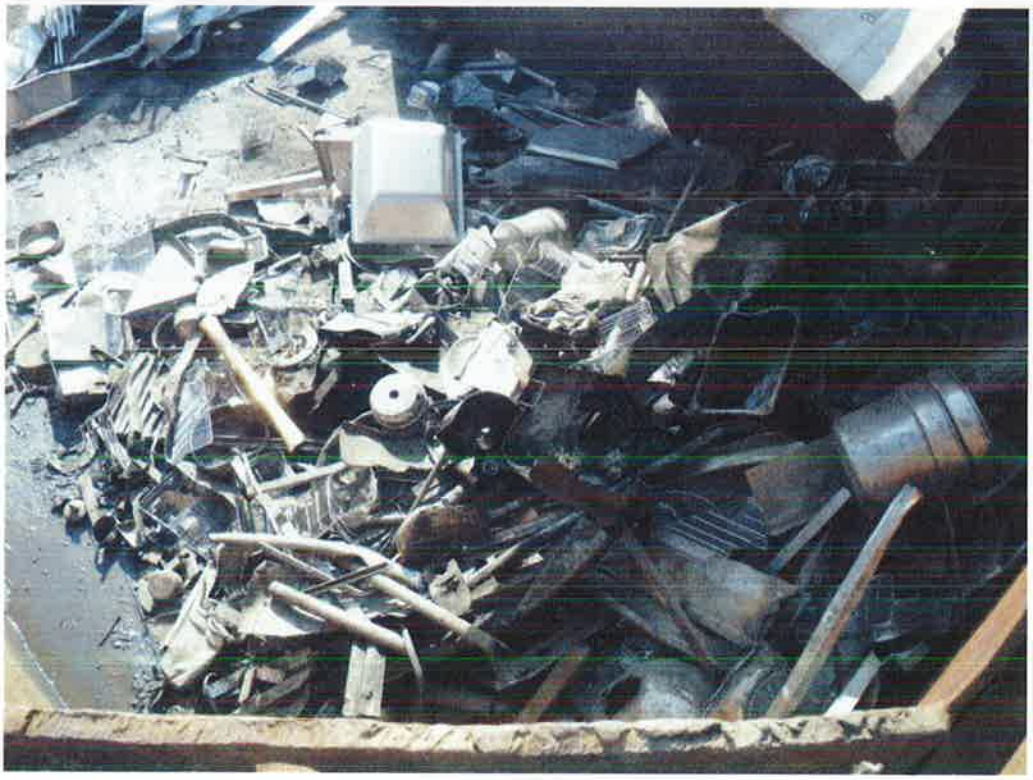
Photograph 21. **Alternate view of Photograph 20.**



Photograph 22. **Close-up of two tanks in the building leaking onto the floor.**

Photograph 23. **Hydraulic machinery with what appears to be oil underneath.**

Photograph 24. **Debris from metal separation.**



Photograph 25. **Alternate view of the debris including fluid pooling to the left.**

Photograph 26. **Alternate view of the fluid pooling towards the trench.**

Photograph 27. **Overall view of the facility from the roof of the scrap bay.**

Photograph 28. **Another overall view of the facility.**

Photograph 29. Entrance to the trench.

Photograph 30. The end of the trench leading into the small runoff collection pond.

Photograph 31. **Close-up view of the manual pump in the small runoff collection pond.**

Photograph 32. **Alternate view of the entrance to the trench from the opposite side of the wall shown in Photograph 30.**

Photograph 33. **Heavy staining on the concrete floors.**

Photograph 34. **Debris adjacent to the large runoff collection pond.**

Photograph 35. **Red hose leading from the manual pump in the small runoff collection pond to the large runoff collection pond.**

Photograph 36. **View of debris just right of the large runoff collection pond.**

Photograph 37. **Alternate view of debris adjacent to the large runoff collection pond.**

Photograph 38. **Ladder next to the northern end of the large runoff collection pond.**

Photograph 39. **Saturated absorbent sock at the northern end of the large runoff collection pond.**

Photograph 40. **Alternate view of the absorbent sock relative to the northern end of the large runoff collection pond.**

Photograph 41. **Overall view of the facility from the northern end of the large runoff collection pond.**

Photograph 42. **Alternate view of the absorbent sock at the northern end of the large runoff collection pond.**

Photograph 43. **Close-up view of the absorbent sock with orange indicating its original color at the northern end of the large runoff collection pond.**

Photograph 44. **Close-up view of a drum adjacent to the northern end of the large runoff collection pond. Note the drum is uncovered and containing a gray fluid.**

Photograph 45. **Fluid leaking from under the conveyor belt of the "crusher".**

Photograph 46. **View of Entrance 1 from the inside the yard showing staining on the ground.**

Photograph 47. **Overall view of the oil drums stored near Entrance 1.**

Photograph 48. **Air conditioning units, some leaking fluids.**

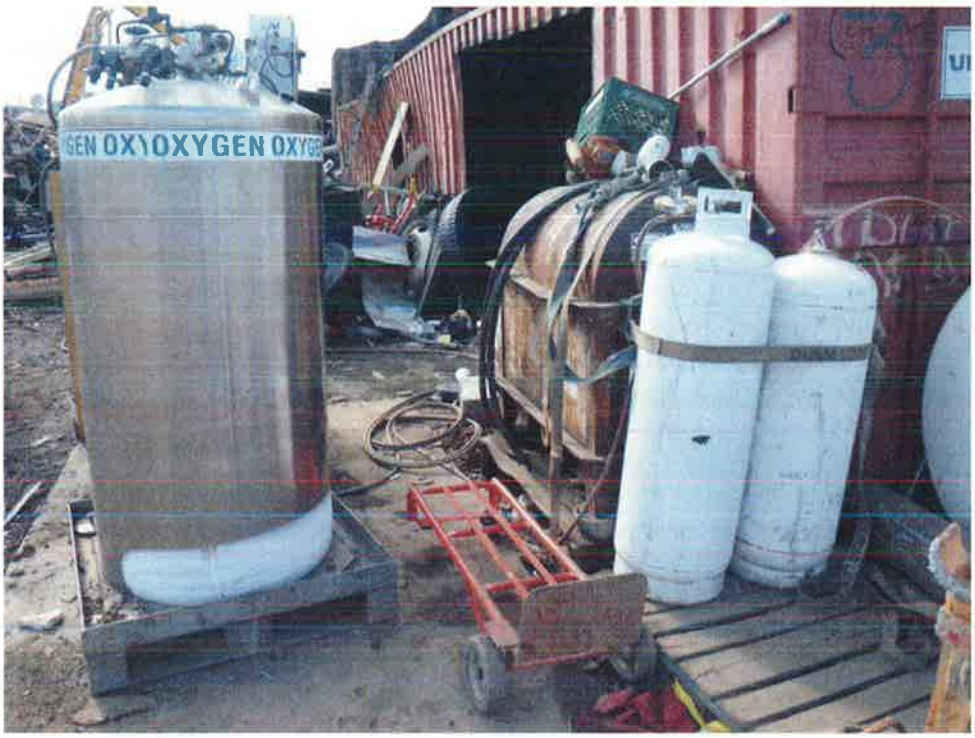
Photograph 49. **Close-up view of the air conditioning units from Photograph 48.**

Photograph 50. **View of the facility perimeter towards Entrance 1 including air conditioning units from Photograph 48.**

Photograph 51. **Alternate view of the perimeter towards Entrance 2.**

Photograph 52. **Left side of the car path looking north towards Entrance 2.**

Photograph 53. **500-gallon diesel tank stored by oxygen tanks near Entrance 2.**



Photograph 54. **Compressed gases stored near oxygen tank and fuel used for torches.**

Photograph 55. **View of the weigh station and magnet separator near pooling water.**

Photograph 56. **Staining passing under the property fence onto the District of Columbia (DC) property near Entrance 2.**

Photograph 57. **Scrapped propane tanks stored near 500-gallon fuel tank.**

Photograph 58. **Storage of debris outside the perimeter of the facility adjacent to the DC property.**

Photograph 59. **View of debris around Entrance 2 and staining on the ground.**

Photograph 60. **Alternate view of Entrance 2 to show the staining is not due to shadows.**

Photograph 61. **Sediment residue on streets outside Entrance 2.**

Photograph 62. **Alternate view of sediment residue around Entrance 2.**

Photograph 63. Super Salvage dumpsters containing scrap stored on DC property near the Super Salvage property line. Note liquid draining from the dumpsters.

Photograph 64. Super Salvage metal dumpsters and pooled water. Dumpsters are located on DC property adjacent to the Super Salvage fence line.

Photograph 65. **Box from Photograph 66 with staining on the outside.**

Photograph 66. **View of inside of box with staining shown in Photograph 65. Box contains engine parts.**

Photograph 67. **Close-up view of what appears to be oil pooled under tanks near Entrance 1.**

Photograph 68. **Close-up view of what appears to be oil pooling under tanks.**

Photograph 69. **Wide view of tanks near Entrance 1.**

Photograph 70. **View of open buckets and storage drums containing used oil filters on top of secondary containment covered in absorbent material.**

Photograph 71. **Plastic container/dumpster of what appears to be waste oil adjacent to the property boundary.**

Photograph 72. **Alternate view of container from Photograph 71 showing exterior staining.**

Photograph 73. **View from the outside of the perimeter fence showing staining.**

Photograph 74. **Close-up view of two barrels containing used oil filters sitting on top of secondary containment. Containment is adjacent to the berm.**

Photograph 75. **Staining on the ground outside of the perimeter fence near dumpsters.**

Photograph 76. **View of items stored the outside of the perimeter fence.**

Photograph 77. **Alternate view of items stored outside of the perimeter fence.**

Photograph 78. **Staining and old dumpsters near Entrance 1.**

Photograph 79. Path of sediment leading from Super Salvage towards the storm drain. Storm drain is located near the corner of First Street SW and S Street SW.

Photograph 80. View of storm drain closest to site near the corner of First Street SW and S Street SW.

Photograph 81. Close-up view of the storm drain with sediment entering from street. Storm drain is near the corner of First Street SW and S Street SW.

Photograph 82. Staining at the intersection of First Street SW and S Street SW.

Photograph 83. View of the gutters and roof drains and the stained exterior of the facility near the corner of First Street SW and S Street SW.

Photograph 84. Stains on the sidewalk adjacent to the site near the corner of First Street SW and S Street SW.

Appendix C
Reconnaissance Photographs

Photograph A. **View toward entrance 1 of Super Salvage, Inc. from the corner of First Street SW and S Street SW.**

Hole in the ground with different pumped liquids at 1711 1st St., SW

View of property

Appendix D
DDOE Illicit Discharge Investigation Report